# APPENDIX E VARIANCE REPORTS

Variance No: 3X variance1 Linked w/NC No:			
Date of Issue: November 14, 2003			
Page _1 of 1			
Project Number: 796887			
_	Linked w/NC No:  Date of Issue: November 14, 2003  Page _1 of 1		

### I.Description: (by the person identifying the change)

The site-specific work plan does not provide procedures for handling unknown items that do not appear to be chemical warfare material (CWM). This variance authorizes the changes presented in Section III (below) to the Site-Specific Work Plan and the Site Specific Safety & Health Plan (SSHP) for 3X Scrap Removal.

Identified by: Stephen Moran Date: November 14, 2003

#### **II.** Justification for Variance:

There are no technical and health & safety procedures in the SFSP to address the handling of items or containers that do not appear to be CWM but whose contents are still unknown. These procedures will allow Shaw to place items, such as liquid-filled containers, into an overpack drum for future disposition. The items or containers will not be overpacked until after the Shaw Senior UXO Supervisor (SUXOS) and the U.S. Army Engineering and Support Center, Huntsville have both made determinations that the items do not appear to be CWM. Prior to disposal of any overpacked items, the contents will be categorized using a HAZCAT test kit and, if appropriate, "hot boxed" (i.e., placed in a container for 4 hours at 70°F and monitored with MINICAMS).

### III. Applicable Document/Work Plan: (by the person identifying the change)

Final Site-Specific Work Plan and SSHP for 3X Scrap Removal. The following procedures will be performed in the event that an unknown item that does not appear to be CWM is encountered.

### 1. Work Plan, Section 2.3 – Excavation of 3X Material, page 2-3:

If an item or container is identified as not being CWM, however, the contents are still unknown, the item or container will be overpacked according to procedures outlined in Sections 3.0 and 4.0 of the SSHP (see below). Prior to disposal of any overpacked items, the contents will be categorized using a HAZCAT test kit and, if appropriate, "hot boxed" (i.e., placed in a container for 4 hours at 70°F and monitored with MINICAMS).

### 2. SSHP, Section 3.0 – Personnel Protective Equipment, page 7:

If excavated containers, bottles, jars, drums, etc are intact and are not presumed to contain chemical agent (as determined by review of the item(s) by the Shaw SUXOS and U.S. Army Engineering and Support Center, Huntsville), the item(s) may be placed in an overpack of appropriate size and capacity by two qualified personnel selected from the UXO team on site. There will be a buddy system in place necessitating a minimum of 2 UXO team members to execute the task. There will be two back-up personnel on standby to support the task effort if additional assistance is required. Both team personnel (Overpack Team and Standby Team) will wear Level B PPE.

The contents of the unknown item or container require identification and, until such information is obtained, the container will not be opened, shaken, or disturbed in any manner such that the contents may be released. Any container that is leaking, cracked, releasing liquid or gas, shall not be handled to inspect the contents. The overpack will be secured in an area removed from personnel and vehicle operations.

### 3. SSHP, Section 4.0 – Site Monitoring Plan, page 11:

Should a suspect CWM item(s) be encountered, the item is intact, and there is no indication of exposure risk based on sampling using MINICAMS monitoring or a PID, it will still be presumed that chemical agent may be present in the intact

container. It will still be necessary to initiate the required communications as specified in Attachment 6, and if the item (container, bottle, jar, drum, etc.) is intact (not leaking, cracked, releasing liquid or gas), and the review conducted by the Shaw SUXOS and the U.S. Army Engineering and Support Center, Huntsville indicates the item is not presumed to contain chemical agent, it may be placed in an overpack for secure storage until more positive identification can be safely made of the contents. The PPE required for the overpack personnel team is specified in Section 3.0.

Distribution List:	- Signatures -	
1. Jeanne Yacoub, Shaw Project Manager     2. Steve Moran, Shaw Technical Lead     3. Jack Gregston, Shaw Site Manager	Requested by:	
<ul><li>4. Bill Hetrick, Shaw H&amp;S</li><li>5. Darryl Stabile, US Army Corps of Engineers</li><li>6. Lee Coker, U.S. Army Corps of Engineers</li></ul>	Approved by:	
7. Norm Honea, Shaw 8. Jorge Sanchez, Shaw QA/QC	Project Manager Approval:	
9. Dan Copeland, CEHNC 10. Ben Hodges, Shaw SUXOS 11. Burney Chance, Shaw SSO 12. Bob Hickman, Shaw UXO Manager	Huntsville Engineering & Support Center Approval:	
12. Doo monnan, shaw erre manager	Shaw H&S Approval:	
	Shaw QA Approval:	

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Shew Ewinonmental & Infrastructure, Inc.	Page 1 of 1
Project Name: Fort McClellan	Project Number: 796887

### -Variance Report -

LDescription: (w the power blooding the theaty) The cito-specific work plan does not provide procedures for burding unknown from that do not appear to be chemical worther material (CWM). This variance anticovers the changes presented in Section III (oslow) to the Site-Specific Week Plan and the Site Specific Saidy & Health Plan (SSHP) for 3X Serap Removal

Identified by: Stephen Moran

Date: November 14, 2009

II. Justification for Variance:

There are no reclinical and health & safety procedure in the SFSP to eddress the handling of licens or containers that do not appear to be CWM but whose contents one still unknown. These procedures will allow them to place items, such as liquid. filled exercines, into an overpack from the finine disposition. The items or contrinses will not be overpacked until after the Show Senior UNO Supervisor (SUNOS) and the U.S. Army Engineering and Support Contes, Humaville have been made determinations that the items do not appear to be CWM. Prior to disposal of my overpacked items, the contrade will be emegatized using a HAZCAT test lettend, if appropriate, "but boxed" (i.e., placed in a comming for 4 hours at 70°F and monitored with MINICAMS).

III. Applicable Document/Work Plans to Secretaristic of the charge?
First Site-Specific Work Man and SSAP for IX Secret Removal. The following proceedures will be perfured in the event that as micrown item that does not appear to be CWM is encountered.

- 1. Work Plan, Section 2.3 Deckondon of 3% Material, page 2-3: Here from or comminer is identified as not being CWIs, however, the contents are still unknown, the item or container will te overpacked remains to procedures outlined in Sections 3.0 and 4.0 of the SSEP (see below). Prior to disposal of my overpacked mems, the contexts will be comported using a HAZCAT test kit and, if appropriate, "not bused" (i.e., placed in a container for 4 hours at 70°F and mutatored with MINICAMS).
- SERR, Section 3.D Personnel Protective Equipment, page 7: If excurated semicines, buttles, jang drums, the are intact and one upt presumed to created, chemical agent (as distourined by noview of the stem(s) by the Shew SUXOS and U.S. Anny Engineering and Support Course, Housville), the inem(s) may be placed in an overpack of appropriant size and expandy by two qualified personnel selected from the UKO team on site.
  There will be a buildy system in place accessisating a minimum of 2 UKO team members to execute the task. There will be two back up personnel on standay to support the resk effect if additional assistance is required. Both terms personnel (Overpunk Team and Standby Team) will wear Level B PPE

The contents of the unknown item or container require identification and, until such information is obtained, the complicat will not be opened, shaken, or chimpted in my manner such that the contents may be released. Any container that is leading, eracked, releasing liquid or gas, chall not be bandled to inspect the contents. The overpack will be secured in an men removed from personnel and vehicle operations.

3. SSEP, Section 4.0 - Site Monitoring Man, page 12: Should a suspent CWM incutation on encountered, the item is intent, and there is no indication of exposure tick braced on sampling using MINICAMS presidening or a PID, it will still be presumed that chemical agent may be present in the infinit SHAW EI INC

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container. It will still be necessary to initiate the required communications as specified in Attachment 6, and if the item (constant, bottle, jar, drum, etc.) is intact fact leaving, reached, releasing liquid at gas), and the review constanted by the Shaw SUXOS and the U.S. Army Engineering and Suppost Center, Family the indicates the item is not presented to contain

chanical agent, it may be placed in an everpack for some smage until more positive identification one be safely made of the contents. The PPE required for the everpack personnel term is specified in Section 3.0. and a restaurable service serv Distribution Lies:

1. Jeanne Yacoub, Shaw Project Manager Requested by Z. Stave Moran, Show Technical Lead 3. Jack Gregorin, Show Site Manager 4. Bill Hetrick Show H&S Approved in 5. Danyi Stabile, US Army Corps of Engineers 6. Les Color, U.S. Army Corns of Engineers 7. Nam House, Show Project Manager Appropriate & Jones Sanchez, Share QA/QC 9. Dan Copeland, CEHNC Hortsville Engineering 10. Ben Wodges, Shaw SUXOS 11 Burney Chance, Shaw SSO 12. Bob Mickinsts Shaw UZO Manager Show HAS Approval Shaw QA Approval:

	Variance No. 3X Variance No. 2 Linked w/NC No:	
Shaw Shaw Environmental & Infrastructure, Inc.	Date of Issue: November 17, 2003	
	Page 1 of 1	
Project Name: Fort McClellan	Project Number: 796887	

### I. Description: (by the person identifying the change)

The site-specific work plan does not provide procedures for the use of Level B PPE to access depot area agent monitoring station (DAAMS) sampling equipment (i.e., the DAAMS pump) after a MINICAMS ring-off has occurred in the exclusion zone. Should this occur the following procedure would be followed:

1) Retrieve the DAAMS pump, 2) replace the DAAMS pump with a second unit to collect confirmation samples, and 3) retrieve this second pump for confirmation of the original sample.

This variance authorizes the changes presented in Section III (below) to the Site-Specific Work Plan and the Site Specific Safety & Health Plan (SSHP) for 3X Scrap Removal.

Identified by: Stephen Moran Date: November 17, 2003

### **II.** Justification for Variance:

There are no technical and health & safety procedures in the 3X Work Plan to address the use of Level B PPE after a MINICAMS ring-off has occurred to retrieve DAAMS sampling equipment located inside the exclusion zone at the excavation site. These procedures will allow Shaw to don appropriate levels of personnel protection to accomplish air monitoring.

### III. Applicable Document/Work Plan: (by the person identifying the change)

Final Site-Specific Work Plan for 3X Scrap Removal. The following procedures will be performed in the event that a ring-off occurs.

### 1. Work Plan, Section 2.4 – Monitoring and Identification of 3X Material, page 2-4:

If MINICAMS air monitoring results in two (2) consecutive alarms or ring-offs, two UXO team members will don Level B PPE and enter the exclusion zone to retrieve the DAAMS sampling pumps, replace the pump, then exit the exclusion zone. After 12 to 15 minutes the UXO techs – still in Level B PPE – will re-enter the exclusion zone to retrieve the second DAAMS pump. There will be a buddy system in place necessitating two UXO team members to execute the task. In addition, there will be two back-up personnel on standby to support the effort if additional assistance is required. Both team personnel (DAAMS Team and Standby Team) will wear Level B PPE.

### 2. SSHP, Section 3.0 – Personnel Protective Equipment, page 9:

Because of the toxicity and physical safety concerns associated with chemical agent materials, site personnel will not be permitted to continue work in areas which chemical agent materials have been identified unless work is performed in Level B personal protective equipment.

- NIOSH/MSHA-approved self-contained breathing apparatus or approved positive pressure airline respirator.
- Escape/egress air supply pack
- Saran-coated Tyvek taped at gloves, boots, and respirators
- Nitrile gloves (outer)
- Latex or lightweight nitrile gloves (double inner glove)
- Neoprene steel-toed boots
- Hard hat

• Hearing protection (when working near/adjacent to operating equipment).

### 3. SSHP, Attachment 5, Chemical Agent Monitoring Plan, Section 5.0 – Contingency Plan, page 9:

Following an alarm, all personnel will immediately evacuate the site. Two UXO technicians donning Level B PPE will re-enter the exclusion zone and re-position the end of the monitoring hose over the suspect CWM item. The UXO technicians will retrieve the DAAMS sampling pump. The retrieved pump will be taken to the UXO support team members located in the contamination reduction zone who will in turn take the pump to the monitoring personnel located in the support zone. After 12 to 15 minutes, the UXO team members, in Level B PPE, will re-enter the exclusion zone and retrieve the second DAAMS pump and transport this pump as described above.

Distribution List:	- Signatures -	1.
<ol> <li>Jeanne Yacoub, Shaw Project Manager</li> <li>Steve Moran, Shaw Technical Lead</li> <li>Jack Gregston, Shaw Site Manager</li> </ol>	Requested by:	Date
<ul> <li>4. Bill Hetrick, Shaw H&amp;S</li> <li>5. Darryl Stabile, US Army Corps of Engineers</li> <li>6. Lee Coker, U.S. Army Corps of Engineers</li> </ul>	Approved by:	Date
<ul><li>7. Norm Honea, Shaw</li><li>8. Jorge Sanchez, Shaw QA/QC</li></ul>	Project Manager Approval:	Date
<ul><li>9. Dan Copeland, CEHNC</li><li>10. Ben Hodges, Shaw SUXOS</li><li>11. Burney Chance, Shaw SSO</li></ul>	Huntsville Engineering & Support Center Approval:	
12. Bob Hickman, Shaw UXO Manager	Shaw H&S Approval:	Date Date
	Shaw QA Approval:	Date

	Verionee No: 3% Variance No. 2  Yakked w/NC No:
Shaw Environmental & Infrastructure, Inc.	Date of Issue: November 17, 2003
	Page I of 1
Protect Name: Fort McClellan	Project Number: 796887

L Description: (by the person identifying the change)

The site-specific work plan does not provide procedures for the use of Level B PPE to access depot area agent monitoring station (DAAMS) sampling equipment (i.e., the DAAMS pump) after a Mill ICAMS ring-off has occurred in the exclusion zone. Should this occur the following procedure would be followed:

1) Retrieve the DAAMS pump, 2) replace the DAAMS pump with a second unit to collect confirmation samples, and 3) tetrieve this second pump for confirmation of the original sample.

This variance authorizes the changes presented in Section III (below) to the Site-Specific Work Plan and the Site Specific Safety & Health Plan (SSIIP) for 3X Scrap Removal.

Identified by: Stephen Moran

Date: November 17, 2003

II. Justification for Variance:

There are no tenhnical and health & sefety procedures in the 3X Work Plan to address the use of Level B PPE after a MINICAMS ring-off has occurred to retrieve DAAMS sampling equipment located inside the exclusion zone at the excavation site. These procedures will allow Shaw to don appropriate levels of personnel protection to accomplish air monitorius.

III. Applicable Document/Work Plan: (by the person identifying the change)
Final Site-Specific Work Plan for 3X Scrap Removal. The following procedures will be performed in the event that a ring-off occurs.

- 1. Work Plan, Section 2.4 Monitoring and Identification of 33. Material, page 2.4:
  If MINICAMS air monitoring results in two (2) consecutive alarms or ring-offs, two UKO team members will don Level
  B PPE and enter the exclusion gone to retrieve the DAAMS sampling pumps, replace the pump, then exit the exclusion
  zone. After 12 to 15 minutes the UKO techs still in Level B PPE will resenter the exclusion zone to retrieve the
  second DAAMS pump. There will be a buddy system in place necessitating two UKO team members to execute the
  task. In addition, there will be two back-up personnel on standby to support the effort if additional assistance is required.
  Both team personnel (DAAMS Team and Standby Team) will wear Level B PPE.
- 2. SSHP, Section 3.0 Personnel Protective Equipment, page 9:
  Because of the toxicity and physical safety concerns associated with chemical agent materials, site personnel will not be permitted to continue work in areas which chemical agent materials have been identified unless work is performed in Level B personal protective equipment.
  - NIOSH/MSHA-approved self-contained breathing apparents or approved positive pressure sirline respirator.
  - Escape/cyruss air supply pack
  - Saran-soated Tyvek taped at gloves, boots, and respirates:
  - Nările gloves (outer)
  - Latex or lightweight nitrile gloves (double inner glove)
  - Neoprene steel-toed boots
  - Hard hat

- Hearing protection (when working neuradjacent to operating equipment).
- 3. SSHP, Attachment 5, Chemical Agent Monitoring Plan, Section 5.0 Contingency Plan, page 9: Following an alarm, all personnel will immediately evacuate the site. Two UXO technicisms domning Level B PPE will re-enter the exclusion zone and re-position the end of the monitoring hose over the suspect CWM item. The UXO technicisms will retrieve the DAAMS sampling pump. The retrieved pump will be taken to the UXO support team members located in the contamination reduction zone who will in turn take the pump to the monitoring personnel located in the support zone. After 12 to 15 minutes, the UXO team members, in Lovel B PPB, will re-enter the exclusion zone and retrieve the second DAAMS pump and transport this pump as described above.

Distribution List:

- 1. Jeanne Yacoub, Shaw Project Manager
- 2. Steve Moran, Shaw Technical Lead
- 3. Jack Gregston, Shaw Site Manager
- 4. Bill Herrick, Shaw H&S
- 5. Darryl Stabile, US Army Corps of Engineers
- 6. Lee Coker, U.S. Army Corps of Engineers
- 7. Norm Hones, Shaw
- 8. Jorge Sanchez, Shaw QA/QC
- 9. Dan Copeland, CEHNC
- 10. Ben Hodges, Shaw SUXOS
- 11. Butney Chance, Shaw SSO
- 12. Bob Hickman, Shaw UXO Manager

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	Variance No: 3X variance 3
	Linked w/NC No:
Shaw "	Date of Issue: February 5, 2004
Shaw Environmental & Infrastructure, Inc.	
	Page 1 of 2
Project Name: Fort McClellan	Project Number: 796887

### I. Description:

The *Final Site-Specific Work Plan, 3X Scrap Removal, October 2003* does not provide for the use of alternative methods of identifying inert OE material during excavation.

Identified by: Norm Honea and Ben Hodges Date: January 30, 2004

### II. Justification for Variance:

The Site-Specific Safety and Health Plan (SSHP) and the Site-Specific Unexploded Safety Plan Attachment (UXO Plan) state that "all work will be immediately halted" if "any OE material is encountered that cannot be positively identified as inert".

Only 3X scrap material (OE) is anticipated in the excavations. If any OE material is encountered that cannot be positively identified as inert; or if there is any indication of the presence of CWM materials, all work will be immediately halted, the site evacuated and the appropriate individuals notified (i.e., the site and project managers, the FTMC Base Environmental Coordinator, and the USACE representative).

The verification that an OE item is positively inert is not easy in some cases and requires the utilization of techniques other than visual inspection. Depending on the ordnance encountered, X-ray analysis may be the only method available to determine if an item is hazardous (i.e., contains explosive fillers).

### III. Applicable Document/Work Plan:

- SSHP, Section 4.0, Site Monitoring, page 11, paragraph 5
- UXO Plan, Section 1.0, General Information, page 1, paragraph 5.

Recommend that the reference quoted in the sections listed above be changed to read:

Only 3X scrap material (OE) is anticipated in the excavations. However, if any ordnance item is encountered that cannot be positively identified as inert, and is determined to be safe to move, it will be further investigated. Further investigation may include the use of X-ray techniques. Should X-ray reveal that an ordnance item is non-CWM, the item may be explosively opened to ensure that it does not contain any explosive fillers or components. If the item is suspected to contain an explosive hazard and believed to be unsafe to move, it will be left in place, work will be halted, the site evacuated, and the appropriate individuals notified.

If there is any indication of the presence of CWM materials (such as a MINICAMS alarm), all work will be immediately halted, the site evacuated and the appropriate individuals notified (i.e., the site and project managers, the FTMC Base Environmental Coordinator, and the USACE representative).

FTMC 3X variance 3 Page 2 of 2

	- Signatures -
Distribution List:  1. Jeanne Yacoub, Shaw Project Manager	Requested by:
Steve Moran, Shaw Technical Lead     Jack Gregston, Shaw Site Manager     Bill Hetrick, Shaw H&S	Approved by:
<ul><li>5. Damon Young, US Army Corps of Engineers</li><li>6. Lee Coker, U.S. Army Corps of Engineers</li><li>7. Norm Honea, Shaw</li></ul>	Project Manager Approval:  Date
8. Todd Davidson, Shaw QA/QC 9. Dan Copeland, CEHNC 10. Ben Hodges, Shaw SUXOS	Huntsville Engineering & Support Center Approval:
11. Burney Chance, Shaw SSO 12. Bob Hickman, Shaw UXO Manager	Date
12. Boo mexical, Shaw OAO Wahagei	Shaw H&S Approval:  Date
	Shaw UXO Manager Approval:  Date
	Shaw QA Approval:  Date

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Shaw Edwinonmontal & Infrastructure, Inc.	Variance No. 3X variance 3 Linked winc No. Date of Issue: February 5, 2004 Page I of 2		
Project Name: Fost McClellan	Project Number: 796887		
-Variance Report -			
L Description.  The Final Site-Specific Work Plan, IX Saray Ramoval, October 2003 does not provide for the USe of Stansive methods of identifying heat OR material during excercation.			
Identified by: Notes House and Ben Hedges	Date: Samery 30, 2004		
IL Justification for Vertence			

The Sin-Specific Softry and Realth Flan (SSET) and the Sin-Specific Unemploted Safety Plan Attackment (UKO Flan) state that "all work will be immediately halfed" if "any OE traterial is encountered that cannot be positively identified as more.

Only EX scrap material (OE) is authorated in the excavations. If any OE material is encountered that connect be positively identified as mere; or if there is any indication of the presence of CWM materials, all work will be immediately halted, the site evacuated and the appropriate budividuals notified (i.e., the site and project managers, the FTMC Base Environmental Coordinator, and the USACE representative).

The verification that an OE item is positively inent is not easy in some cases and requires the utilization of techniques other than visual inspection. Depending on the ordnesses encountered, K-ray analysis may be for only method available to determine if an item is hazardore (i.e., contains explosive fillers).

### III. Applicable Decoment/Work Plans

- SSEP, Sociou 4.0, Site Monitoring, page 11, paragraph 5
- UKO Pico, Section 1.0, General Information, page 1, puregraph 5.

Recommend that the reference quoted in the sections listed above be changed to read:

Only IX scrup praterial (CE) is anticipated in the expansions. However, If any ordinarce them is encountered that cannot be positively identified as inset, and is determined to be safe to move, it will be firstly investigated. Further Investigation may include the rate of X-ray techniques. Should X-ray reveal that an ordinate item is non-CWM, the item may be explosively operate to ensure that it does not contain any explosive fillers or components. If the tiem is suspected to contain an explosive hozord and believed to be unsafe of more, it will be left in place, work will be halted, the site evacuated, and the appropriate individuals notified.

If there is any indication of the presence of CHM motorials (such as a MIXICAMS darm), all work will be immediately haited, the site executed and the appropriate individuals notified (i.e., the site and project managers, the FTMC Base Exvironmental Coordinator, and the LISACE representative).

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6. Lee Color, U.S. Army Corps of Engineers
7. Norm Homes, Shaw Project Manager Approva 8. Todd Davidson, Steey QA/QC 9. Dan Copeland, Chilino Handwille Engineering & Sapport Planes, Approval: 10. Ben Hodger, Shaw SUXOS 11. Burgey Charles, Shew SSO Date 12. Bob Hickorn, Shey UXO Manager Shaw H&S Approv Slow UXO Man Shaw QA Approval

Page 1 of 2



Variance No: 3X\_variance 4

Date of Issua: August 11, 2004

Project Name: Fort McClellan

Project Number: 796887

## -Variance Report -

### L. Description: (by the person identifying the change)

3X Variance No. 1 (dated November 14, 2003) states that items or containers recovered will not be overpacked until after the Shaw SUXOS and U.S. Army Engineering and Support Center, Huntsville (USAESCH) have both made determinations that the recovered items do not appear to be CWM.

Per telephonic conversation on August 11, 2004, Wilson Walters of USAESCH stated to Ben Hodges, Jorge Sanchez, and Jeff Tarr (Shaw); Damon Young (USACE-Mobile); and Gary Harvey (FTMC), that their organization does not desire to be contacted unless recovered items are suspected to be CWM. Additionally, USAESCH stated that Shaw should manage non-suspect CWM items or containers as HTRW and overpack the items following HTRW protocol.

This variance authorizes the changes presented in Section III (below) to the Site-Specific Work Plan and the Site Specific Safety & Health Plan (SSHP) for 3X Scrap Removal.

Identified by: Stephen Moran

Date: August 11, 2004

### II. Justification for Variance:

USAESCH stated in a telephonic conversation on August 11, 2004 that their organization does not desire to be contacted by Shaw nor USACE-Mobile in the identification of unknown items unless recovered items are suspected to be CWM.

### III. Applicable Document/Work Plan; (by the person identifying the change)

Final Site-Specific Work Plan and SSHP for 3X Scrap Removal. The following procedures will be performed in the event that an unknown item that does not appear to be CWM is encountered.

### 1. Work Plan, Section 2.3 - Excavation of 3X Material, page 2-3:

If an item or container is identified as not being CWM, however, the contents are still unknown, the item or container will be overpacked according to procedures outlined in Sections 3.0 and 4.0 of the SSHP (see below). Prior to disposal of any overpacked items, the contents will be categorized using a HAZCAT test kit and, if appropriate, "hot boxed" (i.e., placed in a container for 4 hours at 70°F and monitored with MINICAMS).

### 2. SSHP, Section 3.0 - Personnel Protective Equipment, page 7:

If excavated containers, bottles, jars, drums, etc are intact and are not presumed to contain chemical agent (as determined by review of the item(s) by the Shaw SUXOS, the item(s) may be placed in an overpack of appropriate size and capacity by two qualified personnel selected from the UXO team on site. There will be a buddy system in place necessitating a minimum of 2 UXO team members to execute the task. There will be two back-up personnel on standby to support the task effort if additional assistance is required. Both team personnel (Overpack Team and Standby Team) will wear Level B PPE.

The contents of the unknown item or container require identification and, until such information is obtained, the container will not be opened, shaken, or disturbed in any manner such that the contents may be released. Any container that is leaking, cracked, releasing liquid or gas, shall not be handled to inspect the contents. The overpack will be secured in an area removed from personnel and vehicle operations.

Page 2 of 2

3. SSFIP, Section 4.0 – Site Monitoring Plan, page 11:

Should a suspect CWM item(s) be encountered, the item is intact, and there is no indication of exposure risk based on sampling using MINICAMS monitoring or a PID, it will still be presumed that chemical agent may be present in the intact container. It will still be necessary to initiate the required communications as specified in Attachment 6, and if the item (container, bottle, jar, drum, etc.) is intact (not leaking, cracked, releasing liquid or gas), and the review conducted by the Shaw SUXOS indicates the item is not presumed to contain chemical agent, it may be placed in an overpack for secure storage until more positive identification can be safely made of the contents. The PPE required for the overpack personnel team is specified in Section 3.0.

### Distribution List:

- 1. Jeanne Yaconb, Shaw Project Manager
- 2. Steve Moran, Shaw Technical Lead
- 3. Jeff Tarr, Shaw Site Manager
- 4. Doug Russell, Shaw H&S
- 5. Damon Young, US Army Corps of Engineers
- 6. Lee Coker, U.S. Army Corps of Engineers
- 7. Rob Madey, Shaw
- 8. Jorge Sanchez, Shaw QA/QC
- 9. Dan Copeland, CEHNC
- 10. Ben Hodges, Shaw SUXOS
- 11. Steve Hutchings, Shaw SSO
- 12. Bob Hickman, Shaw UXO Manager

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Requested by:	4	K//mg	0	Date
Approved by:	2	of the	8/	N/Of Dett
Project Manager App	roval	Jeanne (	Jaco	M8/11/04
Shaw H&S Approvals	1/2	Kill	D'	8/11/04 Date
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Shaw Environmental & Infrastructure, Inc.

Variance No: 3X variance 5

Linked w/NC No:

Date of Issue: September 1, 2004

Page 1 of 1

Project Name: Fort McClellan Project Number: 796887.01220300

-Variance Report -

### I. Description:

The *Final Site-Specific Work Plan, Unexploded Ordnance Safety Plan, 3X Scrap Removal, October 2003* does not identify who is authorized to enter the site from the 450-foot exclusion zone in section 2.2, only that two (2) individuals will be positioned at the 450-foot exclusion zone to prevent *unauthorized* personnel from entry. Technical Escort Unit (TEU) is requesting Shaw personnel perform repairs to the Interim Holding Facility (IHF) located inside the 450-foot exclusion zone, specifically the air conditioner, electrical, and removal of vegetation.

Identified by: Jeffrey J. Tarr, PG - Shaw Site Manager | Date: 9/01/04

### II. Justification for Variance:

Maintenance and repair of the IHF inside the established 450-foot exclusion zone.

III. Applicable Document/Work Plan: Final Site Specific Unexploded Ordnance Construction Support 3X Scrap Removal Training Area T-38, Former Technical Escort Reaction Area, Parcel 186(6), October 2003

One UXO technician will escort the Shaw Electrician and clearing crew inside the 450-foot exclusion zone for maintenance repairs. Two Shaw personnel will remain at the 450-foot exclusion zone to prevent *unauthorized* personnel from entering the exclusion zone.

### - Signatures -**Distribution List:** Requested by: 1. Jeanne Yacoub, Shaw Project Manager Date 2. Steve Moran, Shaw Technical Lead 3. Jeff Tarr, Shaw Site Manager Approved by: 4. Doug Russell, Shaw H&S Date 5. Damon Young, US Army Corps of Engineers 6. Lee Coker, U.S. Army Corps of Engineers **Project Manager Approval:** 7. Jorge Sanchez, Shaw QA/QC Date 8. Dan Copeland, CEHNC 9. Ben Hodges, Shaw SUXOS **Huntsville Engineering & Support Center Approval:** Date Shaw H&S Approval: Date **Shaw UXO Manager Approval:** Date **Shaw QA Approval:** Date



Shaw Environmental & Infrastructure, Inc.

Variance No: 3X\_variance \$6 \$\frac{\mathcal{H}^{1}}{\infty}\right|\_{\infty}\right|\_{\infty}

Date of Issue: September 23, 2004

Project Name: Fort McClellan

Project Number: 796887

# -Variance Report -

### I. Description: (by the person identifying the change)

4.2-inch chemical, M2 and M2A1 projectile ordnance was recovered from T-38 anomalies 12 and 13 during 3X scrap removal activities. Some of the projectiles recovered have nose plugs installed to protect the threads and prevent foreign material from entering the burster tube cavity. The nose plugs also prevent visual inspection of the burster tube cavity. Therefore, a potential explosive hazard can not be eliminated through visual inspection.

Shaw policy states that remote demilitarization (demil) will be performed for all items recovered which cannot be visually certified. Because the burster tube cavity can not be inspected, a procedure is required to remotely demil the 4.2-inch projectiles that have nose plugs.

Identified by: Ben Hodges

Date: September 20, 2004

#### II. Justification for Variance:

The Final Site-Specific Work Plan, 3X Scrap Removal (Shaw, October 2003) and the Final SSWP Addendum (Shaw, July 2004) do not provide procedural guidance for the remote demil of 4.2-inch projectiles with nose plugs.

### III. Applicable Document/Work Plan: (by the person identifying the change)

Insert after first paragraph of Section 2.5, Certification and Verification of 3X and OE Scrap (3X Scrap Removal Work Plan, Shaw, October 2003):

Shaw policy states that remote demilitarization (demil) will be performed for all recovered items that cannot be visually certified. Whenever visual inspection of burster tube cavities is not possible, a remote demilitarization will be performed using a band saw. Explosives are not anticipated because fuzes are not installed in the projectiles.

The proposed procedure for remote demil operations is in compliance with Shaw Policy and basic safe operational procedures. The procedure for remote demil operations using an electric metal cutting band saw with adjustable gravity feed and fluid lubrication/cooling is:

- 1. Set up exclusion zone based on calculated minimum separation distance (MSD). In this instance, the MSD has been calculated for the burster tube of a 4.2-inch projectile. This distance will be a minimum of 200-feet in all cases. (See attached MSD calculation sheet and figure displaying 574-ft MSD boundary for this occurrence).
- 2. Locate saws adjacent to the stockpiled MEC.
- 3. Clamp projectiles on saw vise.
- 4. Elevate blade 5 inches above projectile.
- 5. Set gravity feed on saw at 1 inch per 5 minutes.
- 6. Remove all personnel (saw operator and UXO personnel) from the exclusion zone.
- 7. Wait for saw to automatically turn off at completion of cutting. The burster tube cavity at the center of the projectile should be cut through in about 15 minutes. Wait an additional 15 minutes after the saw has turned off.
- 8. Return UXO personnel to the saw and visually examine projectile.

# Insert into Table 4-1, Activity Hazard Analysis for Soil Screening, 3X Scrap Removal Work Plan Addendum (Shaw, July 2004):

Principal Steps	Potential Hazards	Recommended Controls
Injury or damage to operator or other personnel		Employees shall maintain the minimum separation distance (MSD) from the cutting operations according to the MSD calculation (a minimum of 200 feet). Band saw shall be used in strict adherence to manufacturers' recommendations. Crimping MEC in vice shall be performed with minimal force to maintain MEC in position for cutting. The band saw shall be de-energized while placing or removing MEC. Leather palm work gloves shall be used when replacing blades, handling cut MEC, and any item that poses the potential for cut or puncture injury.
Demil Operation Using Band Saw	Electrocution	All extension cords shall be hard or extra hard duty rated. Extension cords shall be inspected prior to use for compromised insulation or missing conductors. GFCI's shall be used on all temporary wiring. Only qualified electricians shall perform electrical installations, troubleshooting, and/or maintenance.
	Contact with potentially contaminated material	Level D Modified PPE will be used. CWM screening with MINICAM monitoring shall be performed when cutting 4.2-inch rounds with nose plugs intact. CWM screening on MEC shall have been performed prior to cutting operation.
	Potential detonation of MEC	Employees shall maintain the minimum separation distance (MSD) from the cutting operations according to the MSD calculation (a minimum of 200 feet). No employee shall approach the band saw until it is confirmed the cutting process is compete and an additional 15 minute waiting period is achieved. Burster tubes exhibiting potential explosive residue shall not be handled until evaluated by the SUXOS and the UXOSO.

Insert into the table on page 4-3 located in Section 4.4 Personal Protective Equipment, 3X Scrap Removal Work Plan Addendum (Shaw, July 2004):

Task	Initial Level of PPE
Demil Operation Using Band Saw	Level D

Insert into Section 4.4 Personal Protective Equipment, 3X Scrap Removal Work Plan Addendum (Shaw, July 2004):

**Level D.** The minimal level of protection that will be required of Shaw personnel at the site will be Level D. The following equipment will be used for Level D protection:

- Coveralls or work clothing
- Leather work gloves (when necessary)
- Steel-toed safety boots
- Safety glasses
- Hard hat
- Hearing protection (when working near/adjacent to operating equipment).
- Latex or Nitrile gloves during groundwater sampling activities.

### - Signatures -**Distribution List:** Requested by: 1. Jeanne Yacoub, Shaw Project Manager 2. Steve Moran, Shaw Technical Lead Approved by: 3. Jeff Tarr, Shaw Site Manager Date 4. Doug Russell, Shaw H&S 5. Damon Young, US Army Corps of Engineers Project Manager Spproval 6. Lee Coker, U.S. Army Corps of Engineers 7. Rob Madey, Shaw 8. Jorge Sanchez, Shaw QA/QC Shaw H&S Approval: Date 9. Dan Copeland, CEHNC 10. Ben Hodges, Shaw SUXOS 11. Steve Hutchings, Shaw SSO Shaw QA Approval: Date 12. Bob Hickman, Shaw UXO Manager Mobile OE Safety Officer: